

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

LAJAEL RUDLEY (02)

No. 3:20-MJ-548-BN

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, Lajael Rudley, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

_____ Crime of violence (18 U.S.C. § 3156)

_____ Maximum sentence life imprisonment or death

_____ 10 + year drug offense

_____ Felony, with two prior convictions in above categories

 X Serious risk defendant will flee

_____ Serious risk obstruction of justice

_____ Felony involving a minor victim

 X Felony involving a firearm, destructive device, or any other dangerous weapon

_____ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

 X Defendant's appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

 Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

 Previous conviction for "eligible" offense committed while on bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

 At first appearance

 X After continuance of **3** days (not more than 3).

DATED this 5th day of June, 2020.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

/s/ Joseph A. Magliolo
Joseph A. Magliolo
Assistant United States Attorney
Texas State Bar No. 24074634
1100 Commerce Street, Suite 300
Dallas, Texas 75242
Tel: 214.659.8736
Fax: 214.767.0978
E-Mail: joseph.magliolo@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on **June 5, 2020**, I hand-filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, in open Court. I do not know the attorney who will represent the defendant; however, I hereby certify that I will hand-deliver a copy of the foregoing document to the attorney or the defendant at the first available opportunity to do so.

/s/ Joseph A. Magliolo
Joseph A. Magliolo
Assistant United States Attorney